

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

DYNAMIC 3D GEOSOLUTIONS LLC,

Plaintiff,

v.

SCHLUMBERGER LIMITED
(SCHLUMBERGER N.V.) et al.,

Defendants.

CASE NO.: 1:14-CV-0112-LY

JURY TRIAL DEMANDED

DECLARATION OF PAIGE ARNETTE AMSTUTZ

1. My name is Paige Arnette Amstutz. I am over 18 years of age, and I am competent to make this Declaration. I am counsel of record for Defendants (“Defendants” or “Schlumberger”) in the above-styled case.
2. This Declaration is made in support of Schlumberger’s Supplemental Submission of Newly Produced Evidence in Support of Defendants’ Motion to Disqualify Counsel and to Dismiss Without Prejudice (“Schlumberger’s Supplemental Submission of Evidence”). The statements in this Declaration are true.
3. I represent Schlumberger in this patent infringement suit (the “Patent Action”). In the Patent Action, Schlumberger moved to disqualify Charlotte H. Rutherford (“Rutherford”) and others, including Collins, Edmonds, Pogorzelski, Schlather & Tower, PLLC (“Collins Edmonds”) and Michael Collins (“Collins”), Plaintiff’s outside counsel (the “Motion to Disqualify”).
4. In connection with Schlumberger’s Motion to Disqualify, Schlumberger served requests for production on Plaintiff Dynamic 3D Geosolutions, LLC (“Dynamic 3D”). In

addition, Schlumberger served subpoenas for production of documents to persons and entities related to Dynamic 3D, including the following:

- A. Rutherford;
- B. Gary Fischman ("Fischman");
- C. Michael Vella;
- D. Acacia Research Group, LLC ("ARG");
- E. Acacia Research Corporation;
- F. Acacia Technologies, LLC;
- G. Austin Geomodeling, Inc.'s ("Austin Geo");
- H. Collins Edmonds; and
- I. Collins.

5. In response to those document requests, Dynamic 3D and many of the subpoenaed parties produced documents and privilege logs. Many of these documents were produced near the eve of the hearing on Schlumberger's Motion to Disqualify, which was held November 20, 2014.
6. Schlumberger now files Schlumberger's Supplemental Submission of Evidence to complete the record with the newly produced documents and privilege logs.
7. Rutherford produced documents to Schlumberger in response to the subpoena that Schlumberger issued to Rutherford. True and correct copies of documents that Rutherford produced are attached to Schlumberger's Supplemental Submission of Evidence as Exhibits 145, 147, 148, 157, 158, 160, 163, 164, 165, 166, 167, 168, 169, 170, 171, 173, 174 and 175.

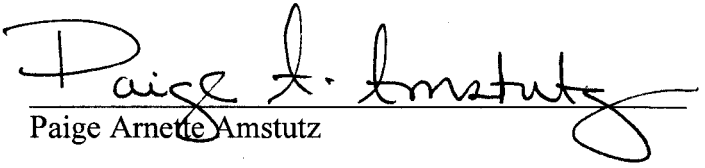
8. ARG produced documents to Schlumberger in response to the subpoena that Schlumberger issued to ARG. True and correct copies of documents that ARG produced are attached to Schlumberger's Supplemental Submission of Evidence as Exhibits 267, 268, 269, 271, 273, 274, 276 and 277.
9. Austin Geo produced documents to Schlumberger in response to the subpoena that Schlumberger issued to Austin Geo. True and correct copies of documents that Austin Geo produced are attached to Schlumberger's Supplemental Submission of Evidence as Exhibits 293, 294, 295, 297, 303 and 304.
10. Dynamic 3D produced documents to Schlumberger in response to the requests for production that Schlumberger served on Dynamic 3D. True and correct copies of documents that Dynamic 3D produced are attached to Schlumberger's Supplemental Submission of Evidence as Exhibits 310, 311 and 317.
11. Schlumberger produced a log of documents reflecting matters on which Rutherford personally represented Schlumberger. Schlumberger entitled the document, "Schlumberger's Log Identifying Documents that May Be Submitted to the Court on November 20, 2014 for In Camera Review." A true and correct copy of Schlumberger's log is attached to Schlumberger's Supplemental Submission of Evidence as Exhibit 344b.
12. Austin Geo produced a privilege log in response to Schlumberger's subpoena to Austin Geo. A true and correct copy of Austin Geo's privilege log is attached to Schlumberger's Supplemental Submission of Evidence as Exhibit 322b.
13. Dynamic 3D produced a privilege log in response to Schlumberger's requests for production of documents to Dynamic 3D. A true and correct copy of Dynamic 3D's

privilege log is attached to Schlumberger's Supplemental Submission of Evidence as Exhibit 328a.

14. ARG produced a privilege log in response to Schlumberger's subpoena to ARG. A true and correct copy of ARG's privilege log is attached to the Supplemental Submission of Evidence as Exhibit 334a.
15. Fischman and ARG produced a supplemental response to Schlumberger's subpoena request number 9. A true and correct copy of Fischman and ARG's supplemental response is attached to Schlumberger's Supplemental Submission of Evidence as Exhibit 340a.
16. ARG produced an amended privilege log in response to Schlumberger's subpoena to ARG. A true and correct copy of ARG's amended privilege log is attached to Schlumberger's Supplemental Submission of Evidence as Exhibit 345.
17. A true and correct copy of the transcript of a hearing held before the Honorable United States District Judge Keith P. Ellison on October 31, 2014 is attached to Schlumberger's Supplemental Submission of Evidence as Exhibit 346.
18. A true and correct copy of the transcript of a hearing held before the Honorable United States Magistrate Judge Mark Lane on November 6, 2014 is attached to Schlumberger's Supplemental Submission of Evidence as Exhibit 347.
19. A true and correct copy of Schlumberger's First Supplemental Exhibit List, which was served on Dynamic 3D on November 18, 2014, is attached to Schlumberger's Supplemental Submission of Evidence as Exhibit 348.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed: November 26, 2014.


Paige Arnette Amstutz